

**EXHIBIT 7**  
**ENTIRE EXHIBIT**  
**SUBMITTED UNDER SEAL**

**From:** Ted Lazarus [REDACTED]  
**To:** Ying Liu [REDACTED]  
**Sent:** Fri, 24 Feb 2017 09:37:30 -0500  
**Subject:** Re: [Industryinfo] A note on our lawsuit against Otto and Uber  
**Cc:** Yarik Markov [REDACTED], Sterling Augustine [REDACTED], Industryinfo [REDACTED], CongratBot [REDACTED]

REDACTED - PRIVILEGE

On Fri, Feb 24, 2017 at 3:11 AM, Ying Liu [REDACTED] wrote:

According to Wikipedia page:

"**While still working at Google** he founded 510 Systems, a mobile mapping start-up that experimented with Lidar technology.<sup>[7]</sup> Then in 2008 he **founded Anthony's Robots** to build a self-driving Toyota Prius called the "PriboT."<sup>[6]</sup> According to The Guardian, it was "a self-driving Toyota Prius with one of the first spinning Lidar laser ranging units, and the first ever to drive on public roads."<sup>[1]</sup> **Google acquired both 510 Systems and Anthony's Robots** to advance the development of its self-driving car project.<sup>[6]</sup> Levandowski worked on Google's self-driving car until January, 2016 when he left to found Otto, a company that makes self-driving kits to retrofit big rig trucks. "

On Thu, Feb 23, 2017 at 6:29 PM, Yarik Markov [REDACTED] wrote:

More from ars technica article (<https://arstechnica.com/tech-policy/2017/02/waymo-googles-self-driving-car-division-sues-uber-over-patent-infringement/?comments=1>):

As Google tells it, Levandowski then conducted his data heist on December 11, 2015, then copied the data to an SD card three days later. The following day, December 18, he reformatted the laptop. Levandowski then met with Uber officials in San Francisco on January 14, 2016, and resigned from Google less than two weeks later. Otto, Levandowski's company, publicly launched in May 2016. Within months, Otto was poaching Waymo engineers, who allegedly also brought internal data and materials with them.

By August 2016, Uber acquired Otto for \$680 million, "a remarkable sum for a company with few assets and no marketable product."

On Thu, Feb 23, 2017 at 3:14 PM Sterling Augustine <[saugustine@google.com](mailto:saugustine@google.com)> wrote:

<https://medium.com/waymo/a-note-on-our-lawsuit-against-otto-and-uber-86f4f98902a1#.1g2x7pms6>

LawyerCats! Careful!

## A note on our lawsuit against Otto and Uber

Competition in the self-driving space is a good thing; it pushes everyone to develop better, safer and more affordable technology. But we believe that competition should be fueled by innovation in the labs and on the roads, not through unlawful actions.

Recently, we uncovered evidence that Otto and Uber have taken and are using key parts of Waymo's self-driving technology. Today, we're taking legal action against Otto and its parent company Uber for misappropriating Waymo trade secrets and infringing our patents. We wanted to share more context on why we made this decision.

### Our investments in self driving cars and LiDAR

Our team formed in 2009 with the goal of making transportation safer and easier for millions of people. We've made tremendous progress since then, developing custom software and hardware in-house, dramatically improving the performance of our self-driving system, accumulating millions of miles of experience and completing the world's first truly autonomous ride on public roads.

One of the most powerful parts of our self-driving technology is our custom-built LiDAR—or “Light Detection and Ranging.” LiDAR works by bouncing millions of laser beams off surrounding objects and measuring how long it takes for the light to reflect, painting a 3D picture of the world. LiDAR is critical to detecting and measuring the shape, speed and movement of objects like cyclists, vehicles and pedestrians.

Hundreds of Waymo engineers have spent thousands of hours, and our company has invested millions of dollars to design a highly specialized and unique LiDAR system. Waymo engineers have driven down the cost of LiDAR dramatically even as we’ve improved the quality and reliability of its performance. The configuration and specifications of our LiDAR sensors are unique to Waymo. Misappropriating this technology is akin to stealing a secret recipe from a beverage company.

### **Why we’re taking a stand**

In 2016, Uber bought a six-month old startup called Otto and appointed its founder (a former employee on our self-driving car project) as its head of self-driving technology. At the time, it was reported that Otto’s LiDAR sensor was one of the key reasons Uber acquired the company.

Recently, we received an unexpected email. One of our suppliers specializing in LiDAR components sent us an attachment (apparently inadvertently) of machine drawings of what was purported to be Uber’s LiDAR circuit board—except its design bore a striking resemblance to Waymo’s unique LiDAR design.

We found that six weeks before his resignation this former employee, Anthony Levandowski, downloaded over 14,000 highly confidential and proprietary design files for Waymo’s various hardware systems, including designs of Waymo’s LiDAR and circuit board. To gain access to Waymo’s design server, Mr. Levandowski searched for and installed specialized software onto his company-issued laptop. Once inside, he downloaded 9.7 GB of Waymo’s highly confidential files and trade secrets, including blueprints, design files and testing documentation. Then he connected an external drive to the laptop. Mr. Levandowski then wiped and reformatted the laptop in an attempt to erase forensic fingerprints.

Beyond Mr. Levandowski’s actions, we discovered that other former Waymo employees, now at Otto and Uber, downloaded additional highly confidential information pertaining to our custom-built LiDAR including supplier lists, manufacturing details and statements of work with highly technical information.

We believe these actions were part of a concerted plan to steal Waymo’s trade secrets and intellectual property. Months before the mass download of files, Mr. Levandowski told colleagues that he had plans to “replicate” Waymo’s technology at a competitor.

There are many more details in our [complaint](#), which outlines unlawful misappropriation of our trade secrets, patent infringement and unfair competition. We’re seeking an injunction to stop the misappropriation of our designs, return all trade secret information and cease infringing our patents.

Our parent company Alphabet has long worked with Uber in many areas, and we didn’t make this decision lightly. However, given the overwhelming facts that our technology has been stolen, we have no choice but to defend our investment and development of this unique technology.

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Google

- Ted Lazarus
- Director, Legal

[REDACTED]

[REDACTED]

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